

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION**

**SHON COOPER AND JACKIE  
READ, ON BEHALF OF  
THEMSELVES AND ALL OTHERS  
SIMILARLY SITUATED,**

## **PLAINTIFFS**

## V.

**INTACT PROFESSIONAL HEALTH  
& SAFETY SERVICES, INC.,**

## **DEFENDANT**

4:23-cv-140-SEB-KMB

## **JURY TRIAL DEMANDED**

## **JOINT STIPULATION REGARDING NOTICE TO WORKERS**

1. The parties have agreed to send FLSA collective action notice to similarly situated workers as set forth in this stipulation and ask the Court's approval.
  2. The Parties stipulate to the issuance of notice to a group of individuals that performed work for Defendant Intact Professional Health & Safety Services, Inc. as follows:

**All individuals who worked for Intact Professional Health & Safety Services, Inc., and who were paid on an hourly basis between May 1, 2022 and the present date.**

This is a two-year look-back period as opposed to the three-year period sought by the Plaintiffs. This agreement regarding the look-back period for notice does not affect the Plaintiffs' ability to seek three years' damages look-back for individuals who are plaintiffs in this case based on Defendant's knowing or willful conduct that has been alleged.

3. The Parties further agree to toll the statute of limitations as of May 1, 2024 as to those individuals to whom notice is being sent.

4. The Parties have agreed to use the proposed Notice and Consent to Join forms that are being filed with this Stipulation, and that those forms will be sent to the similarly situated workers.

5. The Parties agree that Intact Professional Health & Safety Services, Inc. will send Plaintiff's counsel an electronic spreadsheet with the names, mailing addresses, and email addresses of all similarly situated workers ("the List") within 20 business days of the Court's Order approving this stipulation.

6. Within 10 business days of Intact Professional Health & Safety Services, Inc. providing the List, the Parties agree that Plaintiffs may mail and email the Notice and Consent forms to the members of the Class. The parties also agree that a website dedicated solely to hosting the notice and the consent forms may be established, and that opt ins may sign the consent forms electronically as part of this website.

7. The Parties agree that 30 days after sending the Notice and Consent, Plaintiffs may mail and email a second time the same Notice and Consent forms to all similarly situated workers who have not submitted their signed consent.

8. The Parties agree that all individuals who wish to join this lawsuit may do so by filing a Consent form with the Court within 45 days of Plaintiffs first sending out notice.

9. The Parties respectfully request that the Court enter an order approving the terms of this stipulation and approving the attached previously filed forms of Notice and Consent.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I certify that on May 14, 2024, I filed on behalf of the Parties jointly the foregoing document with the Court and served all parties of record via ECF.

/s/ Josef F. Buenker  
Josef F. Buenker